



Advocates for Workplace Fairness

December 8, 2022

Via CM/ECF

The Honorable Gabriel W. Gorenstein
United States District Court for the
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Wood et al. v. Mike Bloomberg 2020, Inc.*, No. 20 Civ. 2489 (LTS) (GWG)

Dear Judge Gorenstein:

Along with co-counsel, we represent Plaintiffs and opt-in Plaintiffs in the above-referenced matter. We write to request a 60-day extension of the current fact discovery deadlines in order to accomplish additional depositions and document discovery, in light of Plaintiffs' counsel's competing trial demands and the holiday schedule. The parties have diligently engaged in discovery to date, including taking 16 depositions and producing and reviewing documents. This is Plaintiffs' first request for an extension of discovery deadlines. Below are the current and extended discovery deadlines:

Event	Current Deadline	Deadline With Extension
Fact Discovery Deadline	Jan. 31, 2023	Apr. 1, 2023
Deadline for Expert Reports	Mar. 31, 2023	May 30, 2023
Deadline for Rebuttal Expert Reports	May 15, 2023	July 14, 2023
Deadline for Reply Expert Reports	June 15, 2023	Aug. 14, 2023
Deadline for Expert Depositions	June 30, 2023	Aug. 29, 2023
Deadline for Letter re Intent to File Summary Judgment Motion	June 30, 2023	Aug. 29, 2023

The parties have conferred, and Defendant consents to this extension request.

Respectfully submitted,

Justin M. Swartz

CC: All Record of Counsel (via ECF)